

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

VERIFIED RULE 2019 STATEMENT OF MULTIPLE REPRESENTATION

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the undersigned counsel submits this verified statement (the “**Verified Statement**”) and in support thereof respectfully states as follows:

1. Cain & Skarnulis PLLC (“**C&S**”) and Koskoff Koskoff & Bieder PC (“**Koskoff**” and together with C&S, the “**Connecticut Plaintiffs’ Counsel**”)¹ represent the following parties in the above-captioned matter (collectively, the “**Connecticut Plaintiffs**”²):

- a. David Wheeler;
- b. Francine Wheeler;
- c. Jacqueline Barden;
- d. Mark Barden;
- e. Nicole Hockley;
- f. Ian Hockley;
- g. Jennifer Hensel;
- h. Donna Soto;
- i. Carlee Soto Parisi;
- j. Carlos M. Soto;
- k. Jillian Soto-Marino;
- l. William Aldenberg;
- m. William Sherlach; and
- n. Robert Parker.

¹ Akin, Gump, Strauss, Hauer, & Feld, LLP has provided advice to both the Connecticut Plaintiffs and the Texas Plaintiffs in connection with this chapter 11 case on a strictly pro bono basis and will continue to do so.

² The Connecticut Plaintiffs and their counsel have worked closely with the Texas Plaintiffs and their counsel and will continue to do so.

2. In accordance with Bankruptcy Rule 2019, the address for each of the Connecticut Plaintiffs is shown on **Exhibit A** attached hereto.

3. The Connecticut Plaintiffs are each a creditor, and the nature and principal amount of each of their claims is described on **Exhibit A** attached hereto. In accordance with Bankruptcy Rule 2019, **Exhibit A** provides all disclosable economic interests held by each Connecticut Plaintiff in relation to Free Speech Systems, LLC (the “**Debtor**”).³

4. The Debtor operates as a media company under the brand name “InfoWars,” and is owned by Alexander E. Jones (“**Jones**”).

5. The Debtor and Jones are defendants in three consolidated lawsuits brought by the Connecticut Plaintiffs.⁴

6. The Connecticut Plaintiffs are monitoring the Debtor’s case. Neither C&S nor Koskoff hold any interest in the Debtor or its estate. None of the Connecticut Plaintiffs’ disclosable economic interests have been assigned subsequent to the commencement of the Debtor’s case and have not been solicited for purchase by C&S nor Koskoff.

7. Nothing contained in this Verified Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver of any Connecticut Plaintiff’s rights to assert, file, and/or amend its claim(s) in accordance with applicable law and any orders entered in this case establishing procedures for filing proofs of claim.

³ An additional Connecticut plaintiff, Richard Coan, Trustee of the Bankruptcy Estate of Erica Lafferty is a creditor. Ms. Lafferty has also filed a proof of claim. Mr. Coan and Ms. Lafferty have not appeared in this proceeding, except to file proofs of claim.

⁴ These three consolidated lawsuits are on the Complex Litigation Docket of Waterbury, Connecticut and are named as follows: *Lafferty, et al. v. Jones, et al.*, No. X06-UWY-CV18-6046436-S, *Sherlach v. Jones, et al.*, No. X06-UWY-CV18-6046437-S and *Sherlach, et al. v. Jones, et al.*, No. X06-UWY-CV18-6046438-S.

8. Connecticut Plaintiffs' Counsel reserve the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

Respectfully submitted this 9th day of December 2022.

/s/ Ryan E. Chapple
Ryan E. Chapple
State Bar No. 24036354
Email:rchapple@cstrial.com
CAIN & SKARNULIS PLLC
303 Colorado Street, Suite 2850
Austin, Texas 78701
512-477-5000
512-477-5011—Facsimile
**ATTORNEY FOR THE CONNECTICUT
PLAINTIFFS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Verified Statement has been served on counsel for Debtor, Debtor, the U.S. Trustee, as well as all parties receiving or entitled to notice through CM/ECF and in accordance with the Rules on this 9th day of December 2022.

/s/ Ryan E. Chapple
Ryan E. Chapple

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§
Debtor. §

VERIFICATION

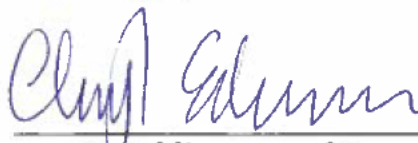
THE STATE OF CONNECTICUT §
§
COUNTY OF FAIRFIELD §

BEFORE ME, personally appeared Alinor Sterling, who after being duly sworn, did state:

"I am one of the attorneys of record for David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker. I have read the Verified Rule 2019 Statement of Multiple Representation and know the contents to be true and correct to the best of my knowledge and belief."


Alinor Sterling, Affiant

SWORN TO and subscribed before me this 9th day of December 2022.


Notary Public, State of Connecticut
Commission Expires: 7/31/25

CHERYL EDELMANN
Notary Public, State of Connecticut
My Commission Expires Jul 31, 2025

EXHIBIT A

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim ⁵
David Wheeler c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$55,000,000.00 in compensatory damages and \$28,429,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
Francine Wheeler c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$54,000,000.00 in compensatory damages and \$28,099,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
Jacqueline Barden c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$28,800,000.00 in compensatory damages and \$19,699,303.73 in punitive damages; post-verdict motions filed by Free

⁵ This statement is not intended as consent pursuant to 28 U.S.C. § 157(c)(2) or waiver of the right to liquidation or estimation of unliquidated claims for purposes of distribution outside of the bankruptcy proceeding pursuant to 28 U.S.C. § 157(b)(2)(B) or waiver of the right to trial by jury pursuant to 28 U.S.C. § 1411.

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim ⁵
	violation of the Connecticut Unfair Trade Practices Act	Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
Mark Barden c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$57,600,000.00 in compensatory damages and \$29,299,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
Nicole Hockley c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$73,600,000.00 in compensatory damages and \$34,629,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim ⁵
<p>Ian Hockley c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604</p>	<p>Plaintiff in a case alleging invasion of privacy by false light; defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act</p>	<p>Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$81,600,000.00 in compensatory damages and \$37,299,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i>, No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i>, No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i>, No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.</p>
<p>Jennifer Hensel c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604</p>	<p>Plaintiff in a case alleging invasion of privacy by false light; defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act</p>	<p>Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$52,000,000.00 in compensatory damages and \$27,429,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i>, No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i>, No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i>, No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.</p>
<p>Donna Soto c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604</p>	<p>Plaintiff in a case alleging invasion of privacy by false light; defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act</p>	<p>Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$48,000,000.00 in compensatory damages and \$26,099,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i>, No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i>, No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v.</i></p>

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim ⁵
		<i>Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
Carlee Soto Parisi c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$66,000,000.00 in compensatory damages and \$32,099,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
Carlos M. Soto c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$57,600,000.00 in compensatory damages and \$29,299,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
Jillian Soto-Marino c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$68,800,000.00 in compensatory damages and \$33,029,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex

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		Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.

William Aldenberg c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$90,000,000.00 in compensatory damages and \$40,099,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.
William Sherlach c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$36,000,000.00 in compensatory damages and \$22,099,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim ⁵
<p>Robert Parker c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604</p>	<p>Plaintiff in a case alleging invasion of privacy by false light; defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act</p>	<p>Verdict for plaintiff and against Free Speech Systems, LLC and Jones in the amount of \$120,000,000.00 in compensatory damages and \$50,099,303.73 in punitive damages; post-verdict motions filed by Free Speech Systems, LLC and Jones pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i>, No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i>, No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i>, No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Free Speech Systems, LLC, in Adv. No. 22-03331, now pending in this Court.</p>